

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FARHAD AZIMA,  
ALG TRANSPORTATION, INC.,  
MAIN 3260 LLC,  
FFV W39 LLC, and  
FFV DEVELOPMENT LLC,

Plaintiffs,

v.

DECHERT LLP,  
DAVID NEIL GERRARD,  
DAVID GRAHAM HUGHES,  
NICHOLAS DEL ROSSO,  
VITAL MANAGEMENT SERVICES, INC.,  
AMIT FORLIT,  
INSIGHT ANALYSIS AND RESEARCH LLC,  
SDC-GADOT LLC,  
AMIR HANDJANI,  
ANDREW FRANK, and  
KARV COMMUNICATIONS,

Defendants.

Case No. 1:22-cv-08728 (PGG) (JW)

**NOTICE OF DEFENDANTS  
AMIT FORLIT, INSIGHT  
ANALYSIS AND RESEARCH,  
LLC, AND SDC-GADOT, LLC'S  
MOTION TO DISMISS THE  
COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants, AMIT FORLIT, INSIGHT ANALYSIS AND RESEARCH, LLC, and SDC-GADOT, LLC'S Motion to Dismiss, and the Joint Memorandum of Law in Support of Defendants' Motions to Dismiss, and all other papers and proceedings herein, Defendants AMIT FORLIT, INSIGHT ANALYSIS AND RESEARCH, LLC, and SDC-GADOT, LLC, by and through their counsel, will move this Court before the Honorable Paul G. Gardephe, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order, pursuant to Rule 12 of the Federal Rules of Civil Procedure (including Rule 12(b)(6) and 12(b)(2)),

dismissing the Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

Dated: February 28, 2023

By: /s/ Christopher S. Salivar, Esq.  
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